

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT**

**Reducing Feral Hog Damage
Through an
Integrated Wildlife Damage Management Program
In the State of Georgia**

United States Department of Agriculture
Animal and Plant Health Inspection Service
Wildlife Services

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (USDA APHIS), Wildlife Services (WS) program responds to requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions may be categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). To evaluate and determine if any potentially significant impacts to the human environment from WS' planned and proposed program would occur, an environmental assessment (EA) was prepared. The EA documents the need for feral hog (*Sus scrofa*) damage management in Georgia and assessed potential impacts of various alternatives for responding to damage problems and conflicts. The EA analyzes the potential environmental and social effects for resolving feral hog damage related to the protection of resources, and health and safety on private and public lands in Georgia. WS' proposed action is to implement an Integrated Wildlife Damage Management (IWDM) program on public and private lands throughout the State. Comments from the public involvement process were reviewed for substantive issues and alternatives which were considered in developing this decision.

WS is the Federal program authorized by law to reduce damage caused by wildlife (Act of 1931, as amended (46 Stat. 1486; 7 U.S.C. 426-426c) and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, Public Law 100-102, Dec. 27, 1987. Stat. 1329-1331 (7 U.S.C. 426c), and the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2001, Public Law 106-387, October 28, 2000. Stat. 1549 (Sec 767). Wildlife damage management is the alleviation of damage or other problems caused by or related to the presence of wildlife, and is recognized as an integral part of wildlife management (The Wildlife Society 1992). WS uses an IWDM approach, commonly known as Integrated Pest Management (WS Directive 2.105) in which a combination of methods may be used or recommended to reduce damage. WS wildlife damage management is not based on punishing offending animals but as one means of reducing damage and is used as part of the WS Decision Model (Slate et al. 1992, USDA 1997, WS Directive 2.201). The imminent threat of damage or loss of resources is often deemed sufficient for wildlife damage management actions to be initiated (U.S. District Court of Utah 1993). Resource management agencies, organizations, associations, groups, and individuals have requested WS to conduct feral hog damage management to protect resources and human health and safety in Georgia. All WS wildlife damage

management activities are in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act of 1973.

Consistency

The analyses in the EA demonstrate that Alternative 2: 1) best addresses the issues identified in the EA, 2) provides safeguards for public health and safety, 3) provides WS the best opportunity to reduce damage while providing low impacts on non-target species, 4) balances the economic effects to agricultural and natural resources, and property, and 5) allows WS to meet its obligations to government agencies or other entities.

Monitoring

The WS program will annually review its impacts on those wildlife species addressed in the EA to ensure that WS program activities do not impact the viability of native wildlife species. In addition, the EA will be reviewed each year to ensure that it and the analysis are sufficient.

Public Involvement

The pre-decisional EA was prepared and released to the public for a 30-day comment period by a legal notice in the *Atlanta Journal Constitution* on February 4, 2005. A letter of availability for the pre-decisional EA was also mailed directly to agencies, organizations, and individuals with probable interest in the proposed program. A total of 4 comment documents were received from the public during the comment period. All comments were analyzed to identify substantial new issues, alternatives, or to re-direct the program. Responses to specific comments are included in Appendix A. All letters are maintained in the administrative file located at the Wildlife Services State Office in Athens, Georgia.

Major Issues

The EA describes the alternatives considered and evaluated using the identified issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

- Effects on Feral Hog Populations
- Effects on Other Wildlife Species, including T&E Species
- Effects on Human Health and Safety
- Humaneness and Animal Welfare Concerns of Methods Used

Affected Environment

The areas of the proposed action could include areas around buildings and homes, industrial sites, urban/suburban woodlots, bridges, public roads, public parks, or at any other sites feral hogs may feed, travel or rest. Damage management activities may be conducted at any of the aforementioned sites along with agricultural fields, wildlife management areas, federal lands, beaches, and private lands. Additionally, the area of proposed action could include airports and surrounding property where feral hogs represent a threat to aviation safety. The proposed action may be conducted on properties held in private, local, state or federal ownership.

Alternatives That Were Fully Evaluated

The following four alternatives were developed to respond to the issues. One additional alternative was considered but not analyzed in detail. A detailed discussion of the effects of the Alternatives on the issues is described in the EA; below is a summary of the Alternatives.

Alternative 1: Technical Assistance Only

This alternative would not allow for WS operational Feral Hog Damage Management (FHDM) in Georgia. WS would only provide technical assistance and make recommendations when requested. Producers, property owners, agency personnel, or others could conduct FHDM using any legal lethal or non-lethal method available to them.

Alternative 2: Integrated Feral Hog Damage Management Program (Proposed Action/No Action)

Wildlife Services proposes to continue the current damage management program that responds to feral hog damage in the State of Georgia. An IWDM approach would be implemented to reduce damage activities to property, agricultural resources, natural resources, and public health and safety. An IWDM strategy would be recommended and used, encompassing the use of practical and effective methods of preventing or reducing damage while minimizing harmful effects of damage management measures on humans, target and non-target species, and the environment. Under this action, WS could provide technical assistance and direct operational damage management, including non-lethal and lethal management methods by applying the WS Decision Model (Slate et al. 1992). When appropriate, physical exclusion or habitat management may be recommended and utilized to reduce damage. In other situations, animals would be removed as humanely as possible using cage traps, snares, shooting or trained dogs. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods. However, non-lethal methods may not always be applied as a first response to each damage problem. The most appropriate response could often be a combination of non-lethal and lethal methods, or could include instances where application of lethal methods alone would be the most appropriate strategy. All management activities would comply with appropriate Federal, State, and Local laws.

Alternative 3: Non-lethal Feral Hog Damage Management Only by WS

This alternative would require WS to use non-lethal methods only to resolve feral hog damage problems. Requests for information regarding lethal management approaches would be referred to the Georgia Department of Natural Resources (GDNR), local animal control agencies, or private businesses or organizations. Individuals might choose to implement WS non-lethal recommendations, implement lethal methods or other methods not recommended by WS, contract for WS direct control services, use contractual services of private businesses, or take no action. Persons receiving WS' non-lethal technical and direct control assistance could still resort to lethal methods that were available to them.

Alternative 4: No Federal WS Feral Hog Damage Management

This alternative would eliminate federal involvement in FHDM in Georgia. WS would not provide direct operational or technical assistance and requesters of WS' assistance would have to conduct their own FHDM without WS input. Information on FHDM methods would still be available through other sources such as USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information would be referred to GDNR, local animal control

agencies, or private businesses or organizations. Individuals could choose to conduct FHDM themselves, use contractual services of private businesses, or take no action.

Alternative Considered but not Analyzed in Detail:

Lethal Feral Hog Damage Management Only By WS

Under this alternative, WS would not conduct any non-lethal control of feral hogs, but would only conduct lethal FHDM activities. This alternative was eliminated from further analysis because some feral hog damage problems can be resolved effectively through non-lethal means. Additionally, lethal methods may not always be available for use due to safety concerns or local ordinances prohibiting the use of some lethal methods, such as the discharge of firearms.

Finding of No Significant Impact

The analysis in the EA indicates that there will not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of this proposed action. I agree with this conclusion and therefore find that an EIS need not be prepared. This determination is based on the following factors:


1. Feral hog damage management as conducted by WS in Georgia is not regional or national in scope.
2. The proposed action would pose minimal risk to public health and safety. Risks to the public from WS methods were determined to be low in a formal risk assessment (USDA 1997, Appendix P).
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected. Built-in mitigation measures that are part of WS's standard operating procedures and adherence to laws and regulations will further ensure that WS activities do not harm the environment.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to wildlife damage management, this action is not highly controversial in terms of size, nature, or effect.
5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the proposed damage management program on the human environment would not be significant. The effects of the proposed activities are not highly uncertain and do not involve unique or unknown risks.
6. The proposed action would not establish a precedent for any future action with significant effects.
7. No significant cumulative effects were identified through this assessment. The EA discussed cumulative effects of WS on target and non-target species populations and concluded that such impacts were not significant for this or other anticipated actions to be implemented or planned within the State.

8. The proposed activities would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.
9. WS has determined that the proposed project would not likely adversely affect any Federal or Georgia State listed threatened or endangered species. This determination was concurred by the United States Fish and Wildlife Service and Georgia Department of Natural Resources.
10. The proposed action would be in compliance with all federal, state, and local laws.

Decision and Rationale

I have carefully reviewed the Environmental Assessment prepared for this proposal and the input from the public involvement process. I believe that the issues identified in the EA are best addressed by selecting Alternative 2 (Integrated Feral Hog Damage Management Program (Proposed Action/No Action Alternative) and applying the associated mitigation measures discussed in Chapter 3 of the EA. Alternative 2 is selected because (1) it offers the greatest chance at maximizing effectiveness and benefits to resource owners and managers while minimizing cumulative impacts on the quality of the human environment that might result from the program's effect on target and non-target species populations; (2) it presents the greatest chance of maximizing net benefits while minimizing adverse impacts to public health and safety; and, (3) it offers a balanced approach to the issues of humaneness and aesthetics when all facets of these issues are considered. The comments identified from public involvement were minor and did not change the analysis. Therefore, it is my decision to implement the preferred alternative as described in the EA.

Copies of the EA are available upon request from the Georgia Wildlife Services Office, School of Forest Resources, University of Georgia, Athens, GA 30602-2152.



Charles S. Brown, Regional Director
APHIS-WS Eastern Region



Date

Literature Cited:

Slate, D. A., R. Owens, G. Connolly, and G. Simmons. 1992. Decision making for wildlife damage management. Transactions of the North American Wildlife and Natural Resources Conference 57:51-62.

The Wildlife Society. 1992. Conservation policies of The Wildlife Society: A stand on issues important to wildlife conservation. The Wildlife Society, Bethesda, Md. 24pp.

U.S. District Court of Utah. 1993. Civil No. 92-C-0052A, January 1993.

USDA (U. S. Department of Agriculture). 1997 (revised). United States Department of Agriculture, Animal Damage Control Program Final Environmental Impact Statement. Vol. 1-3. Animal and Plant Health Inspection Service, Wildlife Services Operational Support Staff. Riverdale, Maryland.

Appendix A
Response to Comments to the Environmental Assessment

**“Reducing Feral Hog Damage Through an
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Issue 1: *The public should be educated on how to co-exist with wildlife, including feral hogs.*

Program Response 1: As described in section 3.2.2 of the EA, WS considers education an important component of the WS feral hog damage management program in Georgia. Under the proposed program, WS will continue to provide outreach materials and educational opportunities to residents of Georgia on how to co-exist with wildlife.

Issue 2: *The proposed methods of control are cruel, inhumane, and will cause severe injury and undue pain and suffering.*

Program Response 2: As described in sections 2.2.4 and 4.1.4 of the EA, WS recognizes that people have wide and varying opinions and beliefs regarding WS use of control methods. Georgia WS personnel are experienced and professional in their use of management methods so that they are as humane as possible under the constraints of current technology and funding. Standard Operating Procedures (SOPs) used to maximize humaneness are listed in Chapter 3 of the EA.

Issue 3: *Non-lethal control measures should be used to reduce feral hog damage and conflicts.*

Program Response 3: As described in the proposed action, WS will consider the use of non-lethal methods as part of an overall management scheme when determined practical and effective for a given situation. Non-lethal methods may be used or recommend as the only method or may be used in combination with lethal control measures to obtain the desired results for a specific project. At times, non-lethal methods may be ineffective at reducing damage and conflicts to acceptable levels. The decision on what types of methods to use or recommend will be based upon the Decision Model described in section 3.2.3 of the EA. As appropriate, non-lethal control measures will continue to be used and recommend by WS to reduce feral hog damage in Georgia.

Issue 4: *Lethal control measures are ineffective at reducing feral hog damage and are only a short-term solution.*

Program Response 4: As described in the proposed action, lethal control is only part of an integrated wildlife damage management approach that WS will use to manage feral hog damage and conflicts in Georgia. When practical and effective, WS will consider the use of non-lethal methods as part of an overall management scheme. WS recognizes that a reduction of a local feral hog population is frequently temporary because immigration from adjacent areas or reproduction replaces the animals removed. While lethal control may only have a temporary short-term effect in many circumstances, this may be the only effective management approach available at a site specific location. At times lethal control may be the only option available to effectively and

efficiently reduce damage to acceptable levels. The decision on when and how a lethal management approach may be implemented will be based upon the Decision Model described in section 3.2.3 of the EA. As shown in section 1.3 of the EA, lethal control measures have been used to reduce feral hog damage and conflicts in Georgia. Therefore, as appropriate, lethal control measures will continue to be used and recommended by WS to reduce feral hog damage in Georgia.

Issue 5: *Control measures are non-selective for target species.*

Program Response 5: As discussed in sections 2.2.2 and 4.1.2 of the EA, WS control methods are highly selective for target species. There has been no lethal take of non-target species by WS while conducting feral hog damage management activities in Georgia. WS take of non-target species during management activities is expected to be extremely low to non-existent. If take of non-target species would occur, these occurrences are rare and should not affect the overall populations of any species. WS' mitigation measures and SOPs are designed to reduce the effects on non-target species' populations and are presented in Chapter 3 of the EA. To reduce the risks of adverse effects to non-target species, WS would select damage management methods that are target-selective or apply such methods in ways to reduce the likelihood of capturing or killing non-target species.

Issue 6: *Wildlife Services should use and recommend the most up to date and effective methods available for preventing and resolving conflicts between humans and feral hogs.*

Program Response 6: WS uses and recommends the most up to date and effective methods available for preventing and resolving conflicts between humans and feral hogs. WS personnel receive information and training on a periodic basis to keep them aware of new methods and techniques that become available for use in the wildlife damage management arena. Furthermore, the National Wildlife Research Center (NWRC) functions as the research arm of WS by providing scientific information and development of methods for wildlife damage management that are effective and environmentally responsible. NWRC scientists work closely with wildlife managers, researchers, field specialists and others to develop and evaluate wildlife damage management techniques. NWRC scientists have authored hundreds of scientific publications and reports, and are respected world-wide for their expertise in wildlife damage management. As new effective methods become available, the Georgia WS will consider them for potential use in managing feral hog damage and conflicts throughout the state.

Issue 7: *Localized reduction of a feral hog population is not justifiable.*

Program Response 7: At times the reduction of a local population or group of feral hogs may be necessary to reduce damage and conflicts to an acceptable level. The decision on when and how to implement such a management scheme will be based upon the Decision Model described in section 3.2.3 of the EA. Management actions would be directed toward localized populations or groups of target species and/or individual offending members of those species. Generalized population suppression across the State, or even across major portions of the State, would not be conducted.

Issue 8: *The EA fails to evaluate an alternative that would require all feasible and practical non-lethal methods to be exhausted before turning to lethal control.*

Program Response 8: This alternative is similar to the proposed action alternative. Under the proposed alternative, an IWDM strategy would be recommended and used, encompassing the use of practical and effective methods of preventing or reducing damage while minimizing harmful effects of damage management measures on humans, feral hogs, other species, and the environment. Under this action, WS would provide technical assistance and operational damage management, including non-lethal and lethal management methods by applying the WS Decision Model (Slate et al. 1992). When appropriate, physical exclusion or habitat management may be recommended and utilized to reduce damage. In other situations, animals would be removed as humanely as possible using cage traps, snares, shooting or trained dogs. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods. However, non-lethal methods may not always be applied as a first response to each damage problem. The most appropriate response could often be a combination of non-lethal and lethal methods, or there could be instances where application of lethal methods alone would be the most appropriate strategy.